
UNITED STATES DISTRICT COURT
for the
Western District of Wisconsin

Daniel Timothy Kallberg,

Plaintiff,

v.

Brad Hoyt and Douglas County,

Defendants.

Case No.: 13CV876

**DEFENDANTS' SECOND
AMENDED NOTICE OF
DEPOSITION DUCES TECUM OF
DANIEL KALLBERG**

PLEASE TAKE NOTICE that the testimony of Daniel Kallberg will be taken by oral examination pursuant to Fed. R. Civ. P. 26 and 30 on Tuesday, September 9, 2014, at 10:00 a.m. in Conference Room 270 in the Douglas County Government Center, 1316 N. 14th Street, Superior, Wisconsin. This examination by oral deposition will be subject to continuance or adjournment from time to time or place to place until completed.

Please bring with you to the deposition the following documents:

1. Photographs, videos or computer generated images of any physical injuries you are claiming in this lawsuit.
2. All bills for any legal services relating in any way to the arrest on December 21, 2007, jailing, conviction, reopening and dismissal of conviction and reinstatement of Daniel Kallberg's driver's license.
3. Any and all documents which evidence that Daniel Kallberg had a disability on December 21, 2008.
4. All documents supporting your claim for economic damages in this lawsuit.

5. All documents which support your claim for lost income in this lawsuit.
6. All documents supporting your allegation the Amended Complaint that Douglas County caused the publication of your name in the local newspapers, the Superior Daily Telegram and the Duluth-News Tribune regarding conviction for OWI.
7. All documents which you contend evidence an unconstitutional policy as alleged in the Amended Complaint.
8. All documents which support the allegation in the Amended Complaint that Douglas County discriminated against you in the administration of public services because of a disability.
9. All documents evidencing an increase of insurance premiums as a result of any actions or omissions of defendants Brad Hoyt and/or Douglas County.
10. All medical bills which you contend relate to any damages you are claiming in this lawsuit.

Dated: August 29, 2014

WELD, RILEY, PRENN & RICCI, S.C.



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